

June 1, 2016

Mr. Dave Navecky Office of Environmental Analysis Surface Transportation Board Docket 35952 395 E. Street SW Washington, DC 20423-0001

Re: Docket No. FD 35952 City of Belvidere Scoping Comments

Dear Mr. Navecky:

The City of Belvidere is a home rule municipality located in Boone County Illinois. Approximately one half of the County's residents reside within the corporate limits of the City of Belvidere. As the largest municipality in Boone County, the center of commercial and industrial development for the County and the County seat, the City is deeply concerned with the proposed route of the Great Lakes Basin Railway.

While hosting significant industrial and commercial enterprises, including Dean Foods, the Chrysler Fiat Assembly Plant and General Mills, Boone County remains primarily an agricultural power house. Its farms and ranches raise crops including, but not limited to, corn and beans, dairy cows and beef cattle for both regional and national consumption. It represents one of the last remaining areas of rural and agricultural land west of the Chicago Metropolitan Area and east of the City of Rockford along the I90 corridor.

Boone County is blessed with some of the richest soils that support its agricultural heritage. Great Lakes Basin Transportation Inc.'s (GLBT) proposed route (the Route) through Boone County will remove approximately 790 acres from production, 775 acres of which are considered prime soils. At least seven (7) additional acres are considered soils of statewide importance. These figures do not include productive acreage that will be lost due to parcels becoming landlocked by the rail line or simply difficult to get to and productively farm.

Boone County is also blessed with an abundance of water located in deep and shallow aquafers which provide not only safe drinking water for its residents, but also a source of irrigation for its agricultural economy. There are at least two (2) confirmed wells within the proposed route and an additional 12 potential wells lying within Boone County. GLBT's own application calls for up to 110 trains per day traveling at speeds up to 70 miles per hour. It is inevitable that accidents or leaks will occur that will release toxic substances into the soils and eventually into the regions aquafers. This risk is simply not acceptable.

Despite GLBT's misleading statements in its application, the proposed route would also negatively

impact significant wet land and forested areas in both Boone County and other areas along the proposed Rail Line. The Boone County Conservation District (the BCCD) filed a response to the GLRB application with the Surface Transportation Board setting forth those areas. The City of Belvidere concurs in the submittals already provided by the BCCD.

Included with this correspondence is a Resolution adopted by the City of Belvidere setting forth its opposition to the proposed route and recommending an alternative solution.

Sincerely,

Michael W. Chamberlain

Mayor

RESOLUTION #2042-2016:

A RESOLUTION IN OPPOSITION TO THE PROPOSED GREAT LAKES BASIN RAILWAY ROUTE THROUGH BOONE COUNTY ILLINOIS

WHEREAS, Great Lakes Basin Transportation Inc. (hereinafter GLBR) proposes to construct a new railroad line (hereinafter Rail Line) around the Metropolitan Chicago Area; and

WHEREAS, the proposed route of the new Rail Line runs the entire length of Eastern Boone County Illinois in a North / South direction and along the Southern Boone County in an East / West Direction; and

WHEREAS, the GLBR anticipates that the new Rail Line will require 200 feet of right of way, accommodate more than 110 trains per day and travel at speeds up to 70 miles per hour; and

WHEREAS, Boone County Illinois contains some of the richest agricultural lands in the Midwest and represents some of the last rural and agricultural land west of the Chicago Metropolitan Area, collar county areas and East of Winnebago County, Illinois; and

WHEREAS, Boone County is a regional and national supplier of corn, soy beans other crops as well as dairy products and beef cattle; and

WHEREAS, one of Boone County's greatest natural resources are its shallow and deep clean water aquafers which not only provide abundant safe drinking water for its residents, but also a source of irrigation for its agricultural economy; and

WHEREAS, despite the GLBR's incorrect and misleading statements in its application, the proposed route would negatively impact significant wet land and forested areas in both Boone County and other areas along the proposed Rail Line. The Boone County Conservation District filed a response to the GLRB application with the Surface Transportation Board setting forth those areas; and

WHEREAS, the City of Belvidere is a home rule municipality and the county seat for Boone County Illinois; and

WHEREAS, the City of Belvidere and Boone County, recognizing the area's historical roots and agricultural strategic importance, have collaboratively worked for years to protect existing open space and farm land through adoption of complimentary zoning ordinances and comprehensive land use plans; and

WHEREAS, a central theme of the joint Comprehensive Plan (the Plan) is to limit industrial and residential growth to specific narrow growth corridors, and corresponding narrow pockets of higher density, in order to allow a mix of industrial and commercial

growth while still preserving the agrarian commercial base which is vital to not just Boone County but the entire region; and

WHEREAS, the Plan preserves most of Eastern Boone County for agricultural and related purposes, the very area where the GLBR plans to build the Rail Line; and

WHEREAS, the proposed Rail Line would remove up to 790 acres from production in Boone County alone, representing not only a large direct economic loss to the local residents but could negatively impact the entire region; and

WHEREAS, the Rail Line would also negatively impact the remainder of the area agricultural resources as many areas would become land locked or difficult to reach and existing natural and artificial irrigation and drainage processes would be negatively impacted; and

WHEREAS, the Rail Line's high volume and high speed train traffic would make it difficult or impossible to responsibly raise and cultivate premium livestock; and

WHEREAS, the high volume, high speed proposed traffic will unavoidably result in train accidents and derailments which potentially could release dangerous toxic substances in the air and on the land resulting in contamination of nearby crops as well as the area's rivers, streams and aquafers; and

WHEREAS, the proposed Rail Line has a "Y" or fork shape at a point where it splits East to head through Boone County and West to terminate the fork past the Greater Chicago Rockford International Airport in Western Winnebago County near the City of Winnebago; and

WHEREAS, it would seem not only more economical, but would also result in fewer environmental impacts to simply extend the western end of the fork in the Rail Line to Wisconsin rather than build two separate forks and negatively impact two separate environmental areas; and

IT IS THEREFORE RESOLVED by the Mayor and City Council for the City of Belvidere as follows:

- 1. The foregoing recitals are incorporated herein by this reference.
- 2. The Corporate Authorities of the City of Belvidere urge the Surface Transportation Board to deny the proposed Rail Line as it relates to Boone County Illinois.
- 3. The Mayor is authorized to file a written comment with the Surface Transportation Board consistent with this resolution.

Approved:	Mayor
Attest:	Laura area City Clerk

(SEAL)

Ayes:

Frank, Morris, Ratcliffe, Sanderson, Snow, Stevens, Arevalo, Brooks,

Sanders and Crawford.

Nays:

None.

Absent:

None.

Date Approved:

June 7, 2016